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June 12, 2018

**VIA ELECTRONIC CASE FILING**

Honorable Arthur D. Spatt, U.S.D.J.  
United States District Court – Eastern District of New York  
100 Federal Plaza, Courtroom 1020  
Central Islip, New York 11722

**Re: Michael Nocella, et al. v. Allstate Insurance Company, et al.**  
**Case No.: 2:18-cv-01995-ADS-AYS**

Dear Judge Spatt:

We represent defendant Allstate Insurance Company (“Allstate”) in the above matter. Pursuant to Section I(F) and Section IV(J) of Your Honor’s Individual Rules and Motion Practices, we write to respectfully request an extension of time for Allstate to file and serve its opposition to plaintiffs’ Motion to Remand, which was filed on June 8, 2018 (ECF No. 8) (the “Remand Motion”).

In accordance with Your Honor’s Individual Rules, we advise the Court of the following: (a) pursuant to Local Civil Rule 6.1(b), the current date for Allstate to submit its opposition to the Remand Motion is June 22, 2018, with plaintiffs’ reply papers due on June 29; (b) this is the first request for an adjournment or extension by any party in this action; and (c) the undersigned contacted plaintiffs’ counsel, Anthony DellUniversita, Esq., regarding this request and Mr. DellUniversita consents to the extension. After conferring with Mr. DellUniversita, and in order to accommodate summer vacation plans and other scheduling conflicts of counsel, the parties further agreed, subject to the Court’s approval, to the following proposed briefing schedule on the Remand Motion:

- Allstate will file and serve its opposition on or before July 16, 2018; and
- Plaintiffs will file and serve their reply on or before July 23, 2018.

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We thank the Court for its consideration of this request.

Respectfully submitted,

/s Michael J. Grohs

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*Attorneys for Allstate Insurance Company*

cc: Anthony P. DellUniversita, Esq. (via ECF)